

Mr. Ron Thomason
Indiana Veneer Products Div. of Harris-Tarkett, Inc.
890 W. Huntington Street
Montpelier, IN 47359

Re: 009-12633-00023
First Administrative Amendment to
CP 009-11014-00023

Dear Mr. Thomason:

Indiana Veneer Products Div. of Harris-Tarkett, Inc. was issued a construction and operation permit CP 009-11014-00023 on September 14, 1999 for construction and operation of an oak veneer floor manufacturing plant. A letter requesting a surface coating description change to indicate the two (2) surface coating operations were present rather than the one (1) listed in construction permit CP 009-11014-00023 was received on August 17, 2000. After reviewing the Technical Support Document related to CP 009-11014-00023, the emission calculations for the surface coating operation were based on two (2) surface coating booths each with a maximum coating rate of 375 pounds of adhesive per hour. A mistake was made in describing the emission units when the existing permit was issued. The request by Indiana Veneer Products is to correct the mistake and there will be no increase in potential to emit criteria pollutants and no new emission units are being added due to this revision. The permit is hereby administratively amended as follows, pursuant to the provisions of 326 IAC 2-7-11 (with new language **bolded** and old language ~~struck out~~).

Section A.2 on page 4 of the construction permit have been revised as follows:

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- of
- (a) One (1) wood-fired boiler, identified as Unit ID #1, with a maximum heat input rate of 29.97 million British units per hour (MMBtu/hr), combusting wood waste, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 1;
 - (b) One (1) natural gas fired boiler, identified as Unit ID #2, with a maximum heat input rate 10.47 MMBtu/hr, used as a backup boiler, exhausting through one (1) stack identified as S/V ID #2; and
 - (c) ~~One (1)~~ **Two (2)** surface coating booths, identified as Unit ID #13a and #13b, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

Section D.2 on pages 19 and 20 of the construction permit has been revised as follows:

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

~~One (1)~~ **Two (2)** surface coating booths, identified as Unit ID #13a and #13b, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage from the **two (2)** surface coating booths (Unit ID #13a and #13b) shall be limited to less than 25.0 tons VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 does not apply.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The Quarterly Report form on page 21 of the construction permit has been revised as follows:

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

Quarterly Report

Company Name: Indiana Veneer Products Div. of Harris-Tarkett, Inc.
Location: 890 W. Huntington Street, Montpelier, Indiana 47359
Permit No.: CP 009-11014-00023
Source: **two (2)** surface coating booths (Unit ID #13a and #13b)
Pollutant: volatile organic compounds (VOC)
Limit: The VOC usage from the surface coating booth shall be limited to less than 25.0 tons VOC per twelve (12) consecutive month period.

Year: _____

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter please contact Nishat Hydari, at 973-575-2555 (ext. 3216) or 1-800-451-6027 press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NH/EVP

cc: File - Blackford County
U.S. EPA, Region V
Blackford County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

CONSTRUCTION and OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Indiana Veneer Products Div. of Harris-Tarkett, Inc.
890 W. Huntington Street
Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: CP 009-11014-00023	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 14, 1999
First Administrative Amendment: 009-12633-00023	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Pages Affected: 4, 19, 20, 21
Issuance Date:	

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary oak veneer floor manufacturing plant.

Authorized Individual: Ron Thomason
Source Address: 890 W. Huntington Street, Montpelier, Indiana 47359
Mailing Address: 890 W. Huntington Street, Montpelier, Indiana 47359
Phone Number: (765) 728-2438
SIC Code: 2435
County Location: Blackford
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) wood-fired boiler, identified as Unit ID #1, with a maximum heat input rate of 29.97 million British units per hour (MMBtu/hr), combusting wood waste, utilizing a cyclone for particulate matter control, exhausting through one (1) stack, identified as S/V ID # 1;
- of (b) One (1) natural gas fired boiler, identified as Unit ID #2, with a maximum heat input rate 10.47 MMBtu/hr, used as a backup boiler, exhausting through one (1) stack identified as S/V ID #2; and
- (c) Two (2) surface coating booths, identified as Unit ID #13a and #13b, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

Two (2) surface coating booths, identified as Unit ID #13a and #13b, each with a maximum coating rate of 375 pounds of adhesive per hour, utilizing a rollcoating application system.

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage from the two (2) surface coating booths (Unit ID #13a and #13b) shall be limited to less than 25.0 tons VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 does not apply.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

Quarterly Report

Company Name: Indiana Veneer Products Div. of Harris-Tarkett, Inc.
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Permit No.: CP 009-11014-00023
Source: two (2) surface coating booths (Unit ID #13a and #13b)
Pollutant: volatile organic compounds (VOC)
Limit: The VOC usage from the surface coating booth shall be limited to less than 25.0 tons VOC per twelve (12) consecutive month period.

Year: _____

Month	Total VOC Emissions This Month (tons)	Previous 11 Month VOC Emissions (tons)	12 Month Total VOC Emissions (tons)
Month 1			
Month 2			
Month 3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____